

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,

Plaintiff,

v.

SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION
OF AMERICA LOCAL 556,

Defendants.

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Civil Action No. 03:17-cv-02278-S

**DEFENDANT SOUTHWEST AIRLINES CO.'S EMERGENCY MOTION AND
REQUEST FOR SANCTIONS**

Defendant Southwest Airlines Co. ("Southwest") brings this Emergency Motion and Request for Sanctions against Plaintiff and Plaintiff's counsel on the grounds set forth herein and as set forth in detail in Southwest's supporting Brief.

GROUND FOR MOTION

1. Plaintiff's counsel appears to have engaged in serious misconduct requiring immediate judicial intervention.
2. The above-described violations potentially pose an urgent threat to the safety of Southwest employees, requiring prompt relief, including the production of information as set forth in Southwest's brief.
3. Plaintiff's counsel's misconduct warrants revocation of his *pro hac vice* admission and an award of attorneys' fees and costs to Southwest.

Dated July 8, 2020

Respectfully submitted,

/s/ Michael A. Correll

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CERTIFICATE OF CONFERENCE

As detailed more fully above and in the brief in support filed concurrently, undersigned counsel has made multiple attempts to confer with counsel for the Plaintiff regarding the issues and the parties have not been able to resolve this dispute.

/s/ Michael A. Correll

Michael A. Correll

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served upon all counsel of record via the Court's ECF System on this 8th day of July, 2020.

/s/ Michael A. Correll

Michael A. Correll